

**EXHIBIT 2**

**FILED UNDER SEAL**

In the Matter Of:

*FAIR ISAAC CORPORATION*

vs

*FEDERAL INSURANCE COMPANY, et al.*

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*RAMESH PANDEY*

*November 13, 2018*

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<p style="text-align: right;">Page 154</p> <p>1 we'll move on from there.</p> <p>2 MR. FLEMING: He did say that, but...</p> <p>3 A. I don't recall it. I don't remember</p> <p>4 it.</p> <p>5 MR. FLEMING: That's what he said.</p> <p>6 Q. I did not hear that answer so...</p> <p>7 A. I was just telling that the guy</p> <p>8 started, you know, this was created in May. It was</p> <p>9 too early for me, probably.</p> <p>10 Q. Good.</p> <p>11 A. I was learning more Chubb at that</p> <p>12 time.</p> <p>13 Q. Okay.</p> <p>14 (Deposition Exhibit 160, e-mail</p> <p>15 string FED003522_0001 to FED003522_0004</p> <p>16 marked Confidential and attachment, was</p> <p>17 marked for identification.)</p> <p>18 Q. This document, Exhibit 160, you see</p> <p>19 in the first page from its date, July 7, 2014, is, I</p> <p>20 guess, similarly at the beginning of your time with</p> <p>21 the company.</p> <p>22 You're not shown as being on the</p> <p>23 e-mail.</p> <p>24 A. Yeah, I'm not.</p> <p>25 Q. Okay. Can you identify the nature of</p>	<p style="text-align: right;">Page 156</p> <p>1 Q. Yes.</p> <p>2 (There is a discussion off the</p> <p>3 record.)</p> <p>4 A. Column "N" for Nancy.</p> <p>5 Q. And then you see "Raleigh" is</p> <p>6 identified a couple of times.</p> <p>7 That's Raleigh, North Carolina?</p> <p>8 A. Yes, data center.</p> <p>9 Q. And then it identifies Toronto as a</p> <p>10 data center?</p> <p>11 A. Yes.</p> <p>12 Q. Is Toronto still a data center for</p> <p>13 Blaze Advisor?</p> <p>14 A. I don't think so. With Toronto --</p> <p>15 what happened, actually, we are consolidating the</p> <p>16 data centers. We had 48 data centers before.</p> <p>17 Raleigh was one of them. Canada was another one.</p> <p>18 Q. Before when, if I can interrupt?</p> <p>19 A. Before merger.</p> <p>20 Q. Okay.</p> <p>21 A. And after that, we made that we need</p> <p>22 only eight data centers. And Canada was not one of</p> <p>23 those eight. So we are migrating everything to</p> <p>24 Raleigh.</p> <p>25 Q. How many data centers today are there</p>
<p style="text-align: right;">Page 155</p> <p>1 the attachment entitled, "CAZ ChEAR report"? Do you</p> <p>2 know what that means?</p> <p>3 A. "ChEAR," Chubb Enterprise</p> <p>4 Architecture report.</p> <p>5 Q. And --</p> <p>6 A. "CAZ," Canada zone probably. I'm</p> <p>7 guessing. But I never heard about this word "CAZ."</p> <p>8 Q. Before the lunch, you weren't</p> <p>9 remembering what "CAZ" meant.</p> <p>10 A. Yeah, that's what I'm saying. I know</p> <p>11 I heard of this, "CAZ."</p> <p>12 But really what we use to the naming</p> <p>13 Canada we used "Z" for "Zone," right. And "CA" --</p> <p>14 but Canada is a country, not a Zone. So it doesn't</p> <p>15 make sense.</p> <p>16 Q. Alright. And as I read this document</p> <p>17 under column "N" --</p> <p>18 MR. FLEMING: Talking about the</p> <p>19 attachment?</p> <p>20 MR. HINDERAKER: I am. Thank you.</p> <p>21 Q. With the document being 1 of 2, you</p> <p>22 know, the attachment on the page being 1 of 2?</p> <p>23 A. Yeah.</p> <p>24 Q. It identifies data center location.</p> <p>25 A. Yeah, in column "N."</p>	<p style="text-align: right;">Page 157</p> <p>1 in the United States?</p> <p>2 A. Oh, you have to have only two,</p> <p>3 primary and secondary.</p> <p>4 Q. And they are located where?</p> <p>5 A. Raleigh and Salisbury, Connecticut.</p> <p>6 Q. And outside of the United States</p> <p>7 today, where are the data centers located?</p> <p>8 A. So, for Latin America, it's either</p> <p>9 somewhere in Texas, Dallas, I think. For Europe,</p> <p>10 it's in Crowley (phonetic), London. Singapore, I</p> <p>11 think, but that's not my -- I'm not...</p> <p>12 Q. You said there were eight data</p> <p>13 centers today?</p> <p>14 A. I'm just -- two of them I know.</p> <p>15 Other one I know because it's in Dallas, but it</p> <p>16 supports the Latin America, all the...</p> <p>17 And Crowley (phonetic) I know because</p> <p>18 that's sort of -- but I think it's one in Singapore.</p> <p>19 Other one I don't know where they are.</p> <p>20 Q. Okay. Do you know if there's one in</p> <p>21 Australia, a data center?</p> <p>22 A. No, I don't think so. I don't know.</p> <p>23 Q. You don't one way or the other?</p> <p>24 A. I don't know.</p> <p>25 Q. Are all of the applications --</p>

<p style="text-align: right;">Page 158</p> <p>1 speaking today, are all of the applications that</p> <p>2 support insurance policies sold in Canada hosted</p> <p>3 from the data center in Raleigh?</p> <p>4 A. Raleigh.</p> <p>5 Q. Do you know when the migration from</p> <p>6 the Toronto data center to everything being on the</p> <p>7 Raleigh data center was completed?</p> <p>8 A. Completed no, I don't. Exact date, I</p> <p>9 don't know. It's somewhere -- it was unleashed 2018</p> <p>10 or late 2017. But I don't know the exact month.</p> <p>11 (Deposition Exhibit 161, Architecture</p> <p>12 Introduction - Fiduciary PI Model</p> <p>13 FED006068_0001 to FED006068_0006 marked</p> <p>14 Confidential, was marked for</p> <p>15 identification.)</p> <p>16 Q. This Exhibit 161 is dated January 22,</p> <p>17 2015. It has a title, "Architecture Introduction -</p> <p>18 Fiduciary PI Model," and it is prepared by Joanne</p> <p>19 Kelly.</p> <p>20 Who is Joanne Kelly, if you know?</p> <p>21 A. She used to be the architect on the</p> <p>22 compliance team.</p> <p>23 Q. Do you know -- what is your</p> <p>24 understanding of the meaning of a "fiduciary PI</p> <p>25 model?"</p>	<p style="text-align: right;">Page 160</p> <p>1 center, service center, those guys. Sometimes it</p> <p>2 comes with the project management team. This is</p> <p>3 what we want to do, this is what we think we should</p> <p>4 do. Let's see how much in the bank, how many people</p> <p>5 we need, how long it will take.</p> <p>6 Q. Did you say project management team</p> <p>7 or product management team?</p> <p>8 A. Product managers have the project</p> <p>9 manager inside. It's like every product they cannot</p> <p>10 speak IT terms. So they need somebody who is like</p> <p>11 project manager for products.</p> <p>12 Q. Alright. So slowing it down a little</p> <p>13 bit, we talked earlier this morning about what a</p> <p>14 "product" is.</p> <p>15 A. Yes.</p> <p>16 Q. A form of "coverage?"</p> <p>17 A. Yeah.</p> <p>18 Q. So somebody that is responsible for</p> <p>19 the product would like to have IT support for the</p> <p>20 product, that person works with a project manager?</p> <p>21 A. Yeah.</p> <p>22 Q. Who then interfaces with IT --</p> <p>23 A. Yeah, yeah.</p> <p>24 Q. -- to describe the desired scope?</p> <p>25 A. Yeah.</p>
<p style="text-align: right;">Page 159</p> <p>1 A. "PI" the "profitability indicator</p> <p>2 model? "I don't know why she put the "fiduciary."</p> <p>3 I don't really know what that is.</p> <p>4 Q. Okay, fair enough. Fair enough.</p> <p>5 That's all I'm asking.</p> <p>6 Are you familiar with this form of</p> <p>7 document?</p> <p>8 A. Okay. So there are similar documents</p> <p>9 and I'm guessing that that's all it probably is.</p> <p>10 MR. FLEMING: He's not asking you to</p> <p>11 guess.</p> <p>12 THE WITNESS: Okay.</p> <p>13 A. This appears like part of the</p> <p>14 document which we used to use to capture the scope</p> <p>15 saying that in the future we are -- we want to do</p> <p>16 the project and that's how the project will look</p> <p>17 like, scoping terms stuff.</p> <p>18 Q. Okay. Who gives you the "scoping"</p> <p>19 information?</p> <p>20 Let me rephrase that question to be</p> <p>21 more precise.</p> <p>22 Who gives IT the "scoping"</p> <p>23 information?</p> <p>24 A. It comes from the front people.</p> <p>25 Sometimes it comes with the operations team, call</p>	<p style="text-align: right;">Page 161</p> <p>1 Q. Okay. So the original source of the</p> <p>2 desire for the technology application comes from</p> <p>3 persons responsible for the products, the forms of</p> <p>4 coverage?</p> <p>5 A. Products or operations.</p> <p>6 Q. Or operations?</p> <p>7 A. Yeah. Operations guy, they need it</p> <p>8 because they have to run the report. If somebody</p> <p>9 asks you like how your office run, how much you</p> <p>10 bring the money, how much you spend the money.</p> <p>11 Q. Okay.</p> <p>12 A. Somebody there who creates all the</p> <p>13 reports, that's not product guys, it's operations</p> <p>14 guys.</p> <p>15 Q. So we've identified "operations"</p> <p>16 people?</p> <p>17 A. Yes.</p> <p>18 Q. And we've identified "product"</p> <p>19 people?</p> <p>20 A. Yeah. Product guys are the guy that</p> <p>21 build the product and they sell. Operations guys is</p> <p>22 the one who keeps all the documentation.</p> <p>23 Q. I understand the difference.</p> <p>24 And how about the underwriters, do</p> <p>25 you put them in the "product" category?</p>